

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED FIFTY-SEVENTH  
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO NO LIABILITY  
CLAIMS FILED BY AEELA MEMBERS**

*Upon the Four Hundred Fifty-Seventh Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico to No Liability Claims Filed by AEELA Members [ECF No. 20788]*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

(the “Four Hundred Fifty-Seventh Omnibus Objection”)<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated May 13, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Fifty-Seventh Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Fifty-Seventh Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Fifty-Seventh Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Fifty-Seventh Omnibus Objection (collectively, the “Claims to Be Disallowed”) asserting claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Four Hundred Fifty-Seventh Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Fifty-Seventh Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Fifty-Seventh Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Fifty-Seventh Omnibus Objection.

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 20788 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Fifty-Seventh Omnibus Objection**

## Four Hundred Fifty-Seventh Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALVAREZ LORA, DAYNELLE COND MUNDO FELIZ 1 CALLE HNOS RODRIGUEZ EMA APT 1911 CAROLINA, PR 00979	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	86617-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
2	ARROYO PEREZ, CARMEN JULIA URB. ALTURCO PENUELAS #2 Q13 15 PENUELAS, PR 00624	06/22/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	117007-2	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
3	AVILES, BLANCA E. HC 1 BOX 2281 LAS MARIAS, PR 00670	02/18/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	173284-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
4	COLON OTERO, MYRNA L. URB. RAMOS ANTONINI #9 CALLE A CIDRA, PR 00739	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	115842-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	CRUZ CRUZ, LUZ MINERVA HACIENDA EL SEMIL BZN. 11137 VILLALBA, PR 00766	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	121266-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
6	CRUZ, ESTHER LOZANO PO BOX 141136 ARECIBO, PR 00614-1136	07/03/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	129141-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
7	MIRANDA, RAFAEL VASSALLO URB LEVITTOWN HC9 CALLE ELISA TAVARES TOA BAJA, PR 00949	06/27/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	44368-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
8	OSORIO CRUZ, BENITA PO BOX 1980-117 LOIZA, PR 00772	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	131761-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						

## Four Hundred Fifty-Seventh Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	PAGAN RIVERA, EMMA R. URB. SANTA MARIA, HACIENDA BERGODERE C-37 GUAYANILLA, PR 00656	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	152049-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
10	RODRIGUEZ RAMIREZ, ILEANA I. PO BOX 1505 RIO GRANDE, PR 00745	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	84025-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings.						
11	RODZ MARTINEZ, LONGINO 5971 HILLSIDE HEIGHTS DR LAKELAND, FL 33812-3333	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	46078	\$15,000.00
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings.						
12	ROSADO PACHECO, ANA M. 2551 TENERIFE VILLA DEL CARMEN PONCE, PR 00716	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	77027-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						



## Four Hundred Fifty-Seventh Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
13	ROSADO SANCHEZ, MILDRED P.O. BOX 1332 LAS PIEDRAS, PR 00771-1332	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	59074-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
14	ROSADO SANCHEZ, MILDRED P.O.BOX 1332 LAS PIEDRAS, PR 00771-1332	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	61318-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
15	SANTIAGO, MARCOLINA BAYOUA HC 02 BOX 8458 JUANA DIAZ, PR 00795	06/20/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	50938-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
16	VALENTIN MONTALVO, JOSE HC 6 BOX 60963 MAYAGUEZ, PR 00680-9557	08/12/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170255-1	Undetermined*
	Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					

## Four Hundred Fifty-Seventh Omnibus Objection

## Exhibit A - Claims to Be Disallowed

NAME		DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
17	VAZQUEZ MEDINA, JOSE A 31 LA VIA BARCELONETA, PR 00617	07/02/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	109653-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
					TOTAL	\$15,000.00*